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Via ECF

Hon. Lewis J. Liman
United States District Court Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Corey Batchelor 20 Cr. 293 (LJL)

Dear Judge Liman:

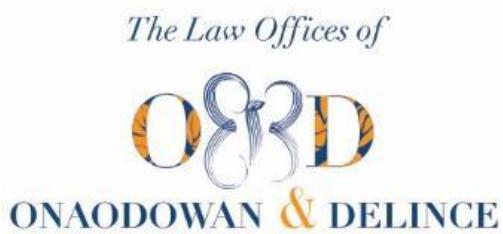
I represent Corey Batchelor in the above referenced indictment. Mr. Batchelor is currently on home incarceration with GPS monitoring. Mr. Batchelor would like to start working to support himself, however he is not allowed to work while on home incarceration. Mr. Batchelor does not have a source of income and he is experiencing financial hardship. He must rely on others to help him pay for food and basic services, such as cell phone service. As of today, he has not received a negative Pretrial report, nor have we received any information that he has violated any of his current bail conditions.

Mr. Batchelor, through Pretrial, has been enrolled in a twelve-week remote program called The Focus Forward Project. This program is a twelve-week course designed to support individuals dealing with a criminal case and meets once per week for two hours. Mr. Batchelor is also required to complete weekly reading and journal assignments. The program focuses on life skills, reading, and reading comprehension. The first half of the class is spent discussing the book they are reading. The second half of the class focuses on a different life skill every week, such as interview skills, resume writing and conflict resolution. Mr. Batchelor would like to be able to put the skills he has been learning in this program to use by looking for and gaining employment. We therefore respectfully request that Mr. Batchelor's bail conditions be modified to home detention.

5/25/2023 SO ORDERED.



LEWIS J. LIMAN
United States District Judge



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Additionally, Mr. Batchelor's current bail conditions prevent him from communicating with his co-defendants Glenn Carwell and Shawndale Lewis, who are his biological brothers. Mr. Batchelor therefore requests that his bail conditions be modified to allow him to communicate with his brothers, so long as they do not discuss this case outside the presence of counsel.

I have consulted with the government and with Mr. Batchelor's Pretrial officer Courtney DeFeo about these issues. With respect to the request for home incarceration, Pretrial services consents, but requires that Mr. Batchelor provide them with regular proof of his job applications and interviews, and with the understanding that he cannot make any additional stops when leaving home for job interviews. The government opposes the change in bail conditions from home incarceration to home detention.

With respect to the request to communicate with the co-defendants, Pretrial defers to the government. The government consents to communication between Mr. Batchelor and the co-defendants, so long as Mr. Batchelor communicates with them on recorded jail calls made under Mr. Lewis' and Mr. Carwell's actual phone accounts. No other communication is permissible outside the presence of counsel.

Should the Court require additional information, we are available for a court appearance to discuss these matters.

DATED: NEW YORK, NEW YORK

May 22, 2023

Respectfully Submitted,

Christine Delince

Christine Delince, Esq.